

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RAW STORY MEDIA, INC.,  
ALTERNET MEDIA, INC.,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC,

Defendants.

Civil Action No. 1:24-cv-01514-CM

**DECLARATION OF MATTHEW  
TOPIC IN SUPPORT OF MOTION  
FOR ADMISSION *PRO HAC VICE***

I, Matthew Topic, declare as follows:

1. Pursuant to Rule 1.3 of the Local Rules of the United States Courts for the Southern and Eastern District of New York, I respectfully submit this Declaration in support of my motion for an Order for admission to practice *pro hac vice* to appear as counsel for Raw Story Media, Inc. and AlterNet Media, Inc. in the above-captioned action.

2. I am a member in good standing of the bar of the State of Illinois. Attached as Exhibit A is a true and correct copy of the Certificate of my Good Standing from the Supreme Court of Illinois.

3. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court, and there are no disciplinary proceedings presently against me.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on March 21, 2024

Chicago, Illinois

/s/ Matthew V. Topic

Matthew Topic